

1 MS. WALLACE: Form.

2 A. I don't know for certain if I saw him
3 that day. If I was working, if I did --

4 BY MR. KRUDYS:

5 Q. I mean, sitting here today, have you
6 ever heard this before, that -- and this is a
7 concrete floor, correct?

8 A. Yes.

9 Q. All right. Concrete floor in the middle
10 -- in late October, lying on the ground for hours.
11 Had you ever heard this before?

12 A. I don't know if it happened routinely or
13 if this was a one-time thing.

14 Q. Did Mr. Givens wear his thermals that
15 were passed out to him?

16 MS. WALLACE: Form.

17 A. I think he did, but, again, I didn't see
18 him every day.

19 BY MR. KRUDYS:

20 Q. But then why -- I mean, he was found in
21 his boxers in his cell for two hours on the date of
22 his death. You don't have any understanding as to
23 how many times he was in his cell permitted to just
24 be in his boxers in the winter months, correct?

25 MS. WALLACE: Form.